

R10_RCRA_Records

From: Palumbo, Janice
Sent: Friday, August 20, 2021 11:17 AM
To: R10_RCRA_Records
Subject: RCRA Records Submittal WA 3019 14F FW: Baxter Arlington RCRA Site - April Monthly Progress Report (Apr. 15 - May 14 Period)
Attachments: April 2019 Baxter Progress Report.pdf

Jan Palumbo (MS 15-H04)
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From: Josh Bale <jbale@gsiws.com>
Sent: Wednesday, May 15, 2019 9:04 AM
To: Palumbo, Janice <Palumbo.Jan@epa.gov>
Cc: Georgia Baxter <gbaxter@jhbaxter.com>; Randy Pratt <rpratt@gsiws.com>; christopher.martin@ecy.wa.gov
Subject: Baxter Arlington RCRA Site - April Monthly Progress Report (Apr. 15 - May 14 Period)

Jan,

Attached is the [April](#) 2019 Progress Report for the Arlington RCRA Site for J.H. Baxter.

Please let me know if you have any questions.

Thank you,



Josh Bale
Supervising Civil/Environmental Engineer
direct: 971.200.8502 | mobile: 530.276.4188
55 SW Yamhill Street, Suite 300, Portland, OR 97204
GSI Water Solutions, Inc. | www.gsiws.com



May 15, 2019

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: April 2019 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the April 2019 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from April 15, 2019 to May 14, 2019.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Nothing to report this period.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Second quarter 2019 sampling to be conducted during this period.
- The CMS Version 4 was submitted during the First Quarter 2017. We anticipate comments from EPA.

OTHER INFORMATION

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Within the last 4 years, only low level detections of PAHs between the Method Detection Limits and the Reporting Limits have been found in wells sampled. As pentachlorophenol drives risk decisions and actions at the site, PAH sampling based on continuous current trends is unnecessary. Baxter will continue to sample for PAHs in one source area well (MW-3) and one well immediately downgradient of the site (MW-30) on an annual basis after Second Quarter 2019. If concentrations of PCPs or PAHs in remaining sampled wells increase significantly across the site, monitoring of the expanded list of wells for PAHs will resume.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or



accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

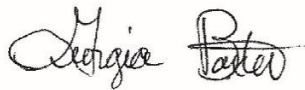
Name: Georgia Baxter

Title: Chief Executive Officer

Date: May 15, 2019

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Chris Martin, Ecology

